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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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DIMITRITZA TOROMANOVA, an )  
Individual, )  
Plaintiff, ) Case No.: 2:12-cv-00328-GMN-(CWH)  
vs. )  
WELLS FARGO BANK, N.A.; WACHOVIA )  
MORTGAGE, FSB; NATIONAL DEFAULT )  
SERVICING CORP; and DOES 1-10, )  
inclusive, )  
Defendants. )

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**STATEMENT CONCERNING REMOVAL**

In accordance with the Minutes of the Court dated February 29, 2012 (Doc. 3), a copy of which is attached hereto, Defendant Wachovia Mortgage, a division of Wells Fargo Bank, N.A., formerly known as Wachovia Mortgage, FSB (“Wells Fargo”) submits the following statement concerning removal:

1. The date(s) on which you were served with a copy of the complaint in the removed action.

The plaintiff served Wells Fargo with a copy of the complaint on February 15, 2012.

1           2. The date(s) on which you were served with a copy of the summons.

2           The plaintiff served Wells Fargo with a copy of the summons on February 15, 2012.

3           3. In removals based on diversity jurisdiction, the names of any served defendants  
4           who are citizens of Nevada, the citizenship of the other parties and a summary of  
5           defendant's evidence of the amount in controversy.

6           None of the served defendants are citizens of Nevada. Wells Fargo is a citizen of South  
7           Dakota. Wells Fargo is informed and believes that National Default Servicing Corporation is an  
8           Arizona corporation with its principal place of business in Arizona. Wells Fargo is informed and  
9           believes that the plaintiff is a citizen of Nevada. The plaintiff seeks an injunction preventing  
10           Wells Fargo from enforcing the deed of trust.

11           Toromanova alleges that she executed a promissory note (the "Note") and deed of trust  
12           (the "Deed of Trust") for the purchase of certain real property located at 2912 Hot Cider Avenue,  
13           North Las Vegas, Nevada 89031 (the "Property") in March 2006. The Note and Deed of Trust  
14           evidence a loan in the amount of \$288,000. Toromanova asks this Court to enjoin all foreclosure  
15           or eviction activities with respect to the Property and, further, to rescind the Trustee's Deed and  
16           restore her "right of seisin in the land and its improvements," apparently seeking outright  
17           ownership of the Property. Accordingly, the amount in controversy exceeds \$75,000.

18           4. If your notice of removal was filed more than thirty (30) days after you  
19           first received a copy of the summons and complaint, the reason removal  
20           has taken place at this time and the date you first received a paper  
21           identifying the basis for removal.

22           Not applicable.

23           5. In actions removed on the basis of the court's jurisdiction in which the action in  
24           state court was commenced more than one year before the date of removal, the  
25           reasons the action should not summarily be remanded to the state court.

26           Not applicable.

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1           6. The name(s) of any defendant(s) known to have been served before you filed the  
2           notice of removal who did not formally join in the notice of removal and the  
3           reasons they did not.

4           Not applicable.

5           DATED this 8th day of March 2012.

6           DAVID J. MERRILL, P.C.

7           By: 

8           DAVID J. MERRILL  
9           MORGAN F. SHAH  
10           10161 Park Run Drive, Suite 150  
11           Las Vegas, Nevada 89145  
12           (702) 566-1935  
13           Attorneys for WELLS FARGO BANK, N.A.

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**CERTIFICATE OF SERVICE**

2 Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 8th day of March 2012,  
3 service of the foregoing Statement Concerning Removal was made to all counsel in the action  
4 through the Court's CM/ECF system. In addition, service was made to the plaintiff by placing a  
5 copy in the United States Mail, postage prepaid and addressed to the plaintiff at her last known  
6 address:

Dimitritza Toromanova  
2912 Hot Cider Avenue  
Las Vegas, Nevada 89031

An employee of David J. Merrill, P.C.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DIMITRITZA TOROMANOVA,

Plaintiff(s),

vs.

WELLS FARGO BANK, N.A., et al.,

Defendant(s).

2:12-cv-00328-GMN -CWH  
MINUTES OF THE COURT

February 29, 2012

**PRESENT:**

The Honorable Gloria M. Navarro, U.S. District Judge

Deputy Clerk: Molly Morrison Recorder/Reporter: None Appearing

Counsel for Plaintiff(s): None Appearing Counsel for Defendant(s): None Appearing

**MINUTE ORDER IN CHAMBERS:**

**TO ALL PARTIES REMOVING ACTIONS TO THE COURT:**

You must, no later than fifteen (15) days from the date hereof, file and serve a signed statement under the above case number and caption that sets forth the following information:

1. The date(s) on which you were served with a copy of the complaint in the removed action.
2. The date(s) on which you were served with a copy of the summons.
3. In removals based on diversity jurisdiction, the names of any served defendants who are citizens of Nevada, the citizenship of the other parties and a summary of defendant's evidence of the amount in controversy.
4. If your notice of removal was filed more than thirty (30) days after you first received a copy of the summons and complaint, the reason removal has taken place at this time and the date you first received a paper identifying the basis for removal.

5. In actions removed on the basis of the court's jurisdiction in which the action in state court was commenced more than one year before the date of removal, the reasons this action should not summarily be remanded to the state court.
6. The name(s) of any defendant(s) known to have been served before you filed the notice of removal who did not formally join in the notice of removal and the reasons they did not.

**IT IS FURTHER ORDERED** that all defendants who joined in the notice of removal may file the statement required by the foregoing jointly.

**IT IS FURTHER ORDERED** that counsel shall have thirty (30) days within which to file a Joint Status Report which must:

1. Set forth the status of this action, including a list of any pending motions and/or other matters which require the attention of this court.
2. Include a statement by counsel of action required to be taken by this court.
3. Include as attachments copies of any pending motions, responses and replies thereto, and any prior court orders or other matters requiring the court's attention which have not previously been filed and are not available on the federal docket for review by this court. Please note that documents filed in the state case are not available to this court for review unless they are attached to the Petition for Removal, the Statement Regarding Removal, or re-filed in federal court.

**IT IS FURTHER ORDERED** that the removing defendant(s) shall serve a copy of this Order on all other parties to the action no later than the time they file and serve a copy of the Statement required by this Order. A party who learns that the Statement(s) filed pursuant to this Order contain(s) incorrect information shall promptly notify this court in writing.

**IT IS SO ORDERED.**

The date of the Clerk's file stamp shall constitute the date of this order.

LANCE S. WILSON, CLERK

By: /s/ Molly Morrison

Deputy Clerk